

EXHIBIT 18

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STATE OF INDIANA

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May 9, 2024

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**RE: 30(b)(6) depositions of the States in *State of Texas, et al. v. Google LLC*,
No. 4:20-cv-00957-SDJ (E.D. Tex.)**

Dear Ms. Bayoumi:

This letter responds to your May 3, 2024, request for clarification “whether and when Indiana implemented a document hold in connection with this case.” As explained in previous correspondence, the records of each division are subject to ten-year document retention schedules previously produced (and publicly available). Compliance with these schedules was more than sufficient to preserve all documents, and neither the OAG nor Google has any reason to believe documents were not retained in accordance with these schedules. The Indiana Office of Attorney General (“OAG”) did not implement a case-specific hold, because none was necessary to preserve every category of relevant information.

As also explained in previous correspondence, the OAG searched and produced responsive documents, subject to its objections, from the central files of two divisions of the Office of Attorney General, viz., the Consumer Protection Division and the Unclaimed Property Division.

The OAG also searched and produced responsive documents, subject to its objections, from the email mailboxes of several custodians. The OAG's ordinary retention practices include a standing hold for all OAG mailboxes, enabling access to all OAG employee email communications, including the mailboxes of all relevant custodians whose files were searched in this case.

The OAG is willing to meet and confer on any alleged deficiency in its retention practices or its 30(b)(6) testimony and may be contacted through undersigned counsel and outside counsel.

Sincerely:

/s/ Matthew Michaloski